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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

WNI 16-017621 Shapiro & DeNardo, LLC 14000 Commerce Parkway, Suite B Mount Laurel, NJ 08054 (856) 793-3080 Charles G. Wohlrab, Esq. 016592012

ATTORNEYS FOR WELLS FARGO BANK, N.A.

IN RE:

TARA L. LYONS A/K/A TARA L. SHEEHAN, DEBTOR Order Filed on July 29, 2019 by Clerk U.S. Bankruptcy Court District of New Jersey

CASE NO.: 19-17259-JKS

HEARING DATE: JULY 25, 2019

JUDGE: HONORABLE JOHN K. SHERWOOD

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

The relief set forth on the following pages, numbered two (2) through two (2) is hereby ORDERED.

DATED: July 29, 2019

Honorable John K. Sherwood United States Bankruptcy Court This matter being opened to the Court by Todd S. Cushner, attorney for the Debtor upon filing of a Chapter 13 Plan, and Wells Fargo Bank, N.A., hereinafter "Secured Creditor," by and through its Authorized Agent, Shapiro & DeNardo, LLC, upon the filing of an Objection to Confirmation of Plan, and parties having subsequently resolving their differences with regard to the Debtor's Chapter 13 Plan; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and the court considered the parties' application for entry of this Consent Order, and for other good cause shown,

- Debtor will apply through Secured Creditor's Servicing agent for a loan modification to cure prepetition arrearages on the mortgage loan secured by 34 Pershing Avenue, Ridgewood, NJ 07450.
- This loan modification review shall be completed by September 23, 2019, or further ordered by the Court.
- 3. Starting May 1, 2019Debtor agrees to maintain contractually monthly post-petition payments to Creditor in the amount to \$3,367.31.
- 4. If a loan modification is not offered by the date specified in Paragraph Two (2), Debtor must within fourteen (14) days of receipt of the denial; 1) modify the Chapter 13 Plan to fully cure Secured Creditor's prepetition arrearages of \$93,953.83 as filed in Proof of Claim No.2-1, 2) modify the Chapter 13 Plan to surrender the subject property, or 3) Convert to a Chapter 7 case.
- 5. Creditor agrees this Order resolves the Objection to Confirmation of Chapter 13 Plan, filed on June 26, 2019; ECF Doc. No.: 30.
- This Consent Order is hereby incorporated into Debtor's Chapter 13 Plan.

We hereby consent to the form, content, and entry of the within Order.

Shapiro & DeNardo, LLC

Charles G. Wohlrab, Esquire Attorney for the Secured Creditor

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Todd S. Cushber, Esquire Attorney for the Debtor Date: 7/23/19
Date:

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Certificate of Notice Page 3 of 3
United States Bankruptcy Court
District of New Jersey

In re: Tara L. Lyons Debtor Case No. 19-17259-JKS Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-2 User: admin Page 1 of 1 Date Rcvd: Jul 29, 2019 Form ID: pdf903 Total Noticed: 1

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 31, 2019.

db +Tara L. Lyons, 34 Pershing Avenue, Ridgewood, NJ 07450-3909

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center. NONE. $\,$ TOTAL: 0

***** BYPASSED RECIPIENTS *****

NONE. TOTAL: 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Transmission times for electronic delivery are Eastern Time zone.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 31, 2019 Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 29, 2019 at the address(es) listed below:

Charles G. Wohlrab on behalf of Creditor WELLS FARGO BANK, N.A. cwohlrab@LOGS.com, njbankruptcynotifications@logs.com

Denise E. Carlon on behalf of Creditor U.S. Bank National Association, as Indenture Trustee of the GMACM Home Equity Loan Trust 2005-HE3 dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com Kevin Gordon McDonald on behalf of Creditor U.S. Bank National Association, as Indenture Trustee of the GMACM Home Equity Loan Trust 2005-HE3 kmcdonald@kmllawgroup.com,

bkgroup@kmllawgroup.com
Marie-Ann Greenberg magecf@magtrustee.com

Todd S Cushner on behalf of Debtor Tara L. Lyons todd@cushnerlegal.com,

alyssa@cushnerlegal.com;jrufo@cushnerlegal.com

U.S. Trustee USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 6